

## **REMARKS**

This Response is submitted in reply to the final Office Action dated August 28, 2006, issued in connection with the above-identified application. Claims 1, 4-9, 12-17, 20-25 and 28-36 are presently pending in the application. With this Response, independent claims 1, 9, 17 and 25 have been amended, and no new matter has been introduced. Thus, favorable reconsideration is respectfully requested.

### **I. Examiner Interview**

The Applicants thank Examiner Mais for granting an interview with the Applicants' representative on November 10, 2006. During the interview, claim amendments were discussed to distinguish the present invention over the cited prior art. In particular, it was suggested that the independent claims be amended to point out that the terminal interface of the present invention provides a direct connection between the receiver unit and the transmitter unit within a terminal. Additionally, the Applicants' representative also noted that the cited prior art fails to include a receiver unit that translates data to a format ready for transmission to the transmitter unit via the terminal interface. At the conclusion of the interview, it was suggested to amend the independent claims to include this feature as well.

### **II. Response To Claim Rejections**

Claims 1, 4-5, 8-9, 12-13, 16-17, 20-21, 24 and 33-35 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Bradshaw et al. (U.S. Patent No. 6,674,731, hereafter "Bradshaw") in view of Cheng et al. (U.S. Patent No. 6,674,731, hereafter "Cheng"). Claims 6, 14 and 22 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Bradshaw in view of Cheng and further in view of Birdwell (U.S. Application No. 2001/0024435, hereafter "Birdwell"). Claims 7, 15 and 23 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Bradshaw in view of Cheng, and further in view of Jorgenson et al. (U.S. Patent No. 6,680,922, hereafter "Jorgenson").

Additionally, claims 25, 28, 29 and 32 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Bradshaw in view Cheng and further in view of Dillon (U.S. Patent No. 6,338,131, hereafter "Dillion"). Claim 30 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Bradshaw, Cheng, Dillion and further in view of Birdwell. Finally, claim 31 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Bradshaw, Cheng and

Dillion and further in view of Jorgenson et al. (U.S. Patent No. 6,680,922, hereafter "Jorgenson"). The Applicants respectfully traverse the above rejections for the following reasons.

To expedite prosecution, the Applicants have amended independent claims 1, 9, 17 and 25 consistent with the recommendations made during the Examiner Interview on November 10, 2006. As amended, independent claims 1, 9, 17 and 25 are directed to a system, method and computer-readable medium implemented for two-way satellite communications between terminals in a satellite network. Each terminal includes, in pertinent part, a transmitter unit, receiver unit, and a terminal interface. More specifically, the terminal interface is provided *directly* between the transmitting unit and the receiving unit *within the terminal* for the exchange of data therebetween. Additionally, the receiver unit translates data received from a host to a data format that conforms to a predetermined protocol supported by a hub. To this end, *the receiver unit provides the translated data to the transmitter unit via the terminal interface already in a format ready for transmission* (see, Applicants' Application, ¶45-¶47, and Figs. 1, 3 and 5a).

Bradshaw teaches or suggests a hub station that transmits data over a satellite link to remote units. In Fig. 10, a remote unit is illustrated in more detail. In Fig. 10, the remote unit includes a receiver system with a standard DVB receiver and a converter. The DVB receiver receives a data signal from, for example, the hub. The converter receives the DVB data signal and converts it to a MAC data format, which can then be communicated to a LAN via a LAN interface. Thus, the receiving system in Bradshaw teaches only processing data received from the hub, not processing data for transmission to the hub (i.e., not ready for transmission). Additionally, there is no description or illustration of a transmitter unit, let alone a interface directly between a transmitter unit and any component of the receiving system. In fact, the only transmitter discussed in Bradshaw is implemented in the hub station (see, Bradshaw, Fig. 8).

In Fig. 8 of Bradshaw, the transmitter includes an internet interface and a converter. The internet interface is implemented for receiving data in a MAC format, and the converter converts the MAC data to a DVB data signal suitable for transmission from the hub. Although the transmitter appears to convert data suitable for transmission to the hub (e.g., DVB), there is

no teachings of a receiver unit in the transmitter, let alone a receiver unit that converts data to a format ready for transmission to the hub.

Therefore, in summary, there is nothing in Bradshaw that teaches or suggests a transmitter unit and receiver unit in the same device (e.g., terminal or hub). Additionally, nothing in Bradshaw teaches or suggests an interface directly between a receiver unit and transmitter unit of a terminal, let alone a receiver unit that provides data to the transmitter unit (via the terminal interface) already in a format ready for transmission. Conversely, in the present invention, a single terminal (i.e., ground terminal) includes both a receiver unit and a transmitter unit communicating via a terminal interface. The receiver unit performs a translation of data into a format supported by the hub, and provides the data to the transmitter unit in format ready for transmission via the terminal interface.

Cheng fails to overcome the deficiencies noted above in Bradshaw. Cheng teaches a method and apparatus that separates network-dependent functions from network-independent functions in set-top boxes (STBs). Although the apparatus in Cheng appears capable of receiving satellite inputs, there is nothing in the reference that teaches or suggests a receiver unit that translates data to a format supported by a hub, wherein the data is provided to a transmitter unit via a terminal interface in format ready for transmission.

Moreover, Birdwell and Jorgenson also do not appear to overcome the deficiencies noted above in Bradshaw and Cheng. Accordingly, even if one of ordinary skill in the art were to combine the teachings of Bradshaw, Cheng, Birdwell and Jorgenson, the combination still would not teach or suggest all the features recited in independent claims 1, 9, 17 and 25 (as amended). In particular, the combination fails to include a terminal interface directly between a receiver unit and transmitter unit in a terminal, wherein the receiver unit provides translated data to the transmitter unit via the terminal interface in a format ready for transmission.

Finally, Dillon is a §102(e)-type reference being applied in a §103(a) rejection, and can be removed as prior art under either the American Inventor's Protection Act or the CREATE act. More specifically, *Dillon and the present invention were commonly owned by or were subject to assignment to the same entity at the time the present invention was made.* Thus, the Applicants respectfully request that this reference be removed as prior art.

Based on the foregoing, independent claims 1, 9, 17 and 25 are now believed to be distinguishable over the cited prior art. Likewise, dependent claims 4-8, 12-16, 20-24 and 28-36 are also believed to be distinguishable over the cited prior art based on their respective dependencies on independent claims 1, 9, 17 and 25.

**III. Conclusion**

The Applicants respectfully submit that claims 1, 4-9, 12-17, 20-25 and 28-36 of the present application are both novel and non-obvious over the prior art of record. Accordingly, the Applicants respectfully request that the rejections be withdrawn and a timely Notice of Allowance be issued in this case. If any fees are due in connection with this application as a whole, the Director is authorized to deduct such fees from deposit account no. 02-1818. If such a deduction is made, please indicate the attorney docket number PD-200323 (115426-531) on the account statement.

Respectfully submitted,

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